

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-8128-RMM

UNITED STATES

v.

SOLOMON CHAMU,

Defendant.

FILED BY SP D.C.

Mar 10, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No.
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No.
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No.
4. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Jonathan Bailyn
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

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ANGELA E. NOBLE
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United States of America

v.

SOLOMON CHAMU,

Case No. 25-mj-8128-RMM

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 7, 2025 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1326(a) & (b)(1)

Illegally Re-Entering the United States After Prior Deportation

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Andy Korzen, ICE DO

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.

Date:

3/10/25

Judge's signature

City and state: West Palm Beach, Florida

Ryon M. McCabe, United States Magistrate Judge

Printed name and title

**AFFIDAVIT
OF
ANDY KORZEN
UNITED STATES DEPARTMENT OF HOMELAND SECURITY
IMMIGRATION AND CUSTOMS ENFORCEMENT**

I, Andy Korzen, being duly sworn, depose and state as follows:

1. I am a Deportation Officer with the Immigration and Customs Enforcement (ICE) and have been so employed for over twenty-one years. I am currently assigned to the ICE Enforcement and Removal Operations, West Palm Beach, Florida. My duties and responsibilities include enforcing criminal and administrative immigration laws of the United States. I have also conducted and participated in investigations of this nature.

2. This affidavit is based upon my own knowledge as well as information provided to me by other law enforcement officers. This affidavit does not set forth every fact known to me regarding the investigation but only those facts necessary to establish probable cause to believe that Solomon CHAMU, also known as Luis Enrique GACIA-CABRERA committed the offense of illegal re-entry after removal, in violation of Title 8, United States Code, Section 1326(a) and (b)(1).

3. On or about March 7, 2025, Solomon CHAMU was arrested in Palm Beach County, Florida on charges of driving without a valid driver's license and resist without violence. He was booked and detained at the Palm Beach County Jail.

4. A review of the immigration records shows that Solomon CHAMU is a native and citizen of Mexico. Records further show that on or about July 12, 2017, Solomon CHAMU was ordered removed. The Order of Removal was executed on or

about September 25, 2019, whereby Solomon CHAMU was removed from the United States and returned to Mexico.

6. Records further show that Solomon CHAMU was convicted of the following felony offenses:

- On or about November 14, 2003, in the Criminal Division of the Circuit Court of the Fifteenth Judicial Circuit of Florida, in and for Palm Beach County of the offense of Possession of Cocaine, in case number 03011950CFA.

- On or about July 17, 2007, in the Criminal Division of the Circuit Court of the Fifteenth Judicial Circuit of Florida, in and for Palm Beach County of the offense of Violation of Probation- Possession of Cocaine, in case number 03011950CFA.

- On or about May 12, 2014, in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida of the offense of Leaving Scene of Crash with Injury, in case number 2013CF013327A.

7. Solomon CHAMU's fingerprints taken in connection with his March 7, 2025, arrest in Palm Beach County were scanned into the IAFIS system. Results confirmed that scanned fingerprints belong to the individual who was previously removed from the United States, that is Solomon CHAMU.

8. A record check was performed in the Computer Linked Application Informational Management System to determine if Solomon CHAMU filed an application for permission to reapply for admission into the United States after deportation or removal. After a search was performed in that database system, no record was found to exist indicating that Solomon CHAMU obtained consent from the Attorney

General of the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law.

9. Based on the foregoing, I submit that probable cause exists to believe that, on or about March 7, 2025, Solomon CHAMU, an alien who has previously been deported and removed from the United States, was found in the United States without having received the express consent from the Attorney General or the Secretary of the Department of Homeland Security for re-admission into the United States, in violation of Title 8, United States Code, Section 1326(a) and (b)(1).



Andy Korzen
Deportation Officer
Immigration and Customs Enforcement

Sworn and Attested to me by Applicant by Telephone (Facetime) pursuant to Fed. R. Crim. P. 4(d) and 4.1 this 10 day of March 2025.



RYON M. McCABE
UNITED STATES MAGISTRATE JUDGE